

Neal M. Rosenbloom, Esq.
(Admitted pro hac vice)
Goldberg Weprin Finkel Goldstein LLP
1501 Broadway, 22nd Floor
New York, New York 10036
Tel. (212) 221-5700
Fax (212) 422-6836
nrosenbloom@gwfglaw.com

Douglas T. Tabachnik, Esq.
Law Offices of Douglas T. Tabachnik, P.C.
63 West Main Street, Suite C
Freehold, NJ 07728-2141
Tel: (732) 780-2760
Fax: (732) 780-2761
dtabachnik@dttlaw.com
*Attorneys for The Retail Stores of 611 6th Avenue LLC,
and its affiliates*

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

-----X
In re:

MODELL'S SPORTING GOODS, INC, et al.¹

Case No. 20-14179 (VFP)
Chapter 11
(Jointly Administered)

Debtor.

-----X

**JOINDER TO LIMITED OBJECTION OF 192 BLOOMFIELD, LLC (DOCKET NO. 245)
TO DEBTORS' REQUEST FOR FURTHER SUSPENSION OF CHAPTER 11 CASES**

The Retail Stores of 611 6th Avenue LLC, and its affiliates, by and through their counsel,
Law Offices of Douglas T. Tabachnik, P.C., by Douglas T. Tabachnik, Esq. respectfully shows to
the Court as follows:

1. The Retail Stores of 611 6th Avenue LLC, and its affiliates, hereby joins in the
Limited Objection to the Debtors' Request for a Further Suspension of Chapter 11 Cases (docket

¹ Modell's Sporting Goods, Inc.; Modell's II, Inc.; Modell's NY II, Inc.; Modell's NJ II, Inc.; Modell's PA II, Inc.; Modell's Maryland II, Inc.; Modell's VA II, Inc.; Modell's DE II, Inc.; Modell's DC II, Inc.; Modell's CT II, Inc.; MSG Licensing, Inc.; Modell's NH, Inc.; Modell's Massachusetts, Inc.; and Modell's Online, Inc.

no. 234) (the “Extension Notice”), filed by 192 Bloomfield, LLC (docket no 245), for the reasons stated therein.

2. The Retail Stores of 611 6th Avenue LLC, and its affiliates reserves the right to supplement this Joinder and make such other and further objections to the Extension Notice as may be necessary, whether at or prior to the hearing on the Motion, including to any proposed form of order.

3. The Retail Stores of 611 6th Avenue LLC, and its affiliates joins in the objections of any other party to the Extension Notice to the extent not inconsistent with this Objection.

WHEREFORE, The Retail Stores of 611 6th Avenue LLC, and its affiliates respectfully requests that the Court limit the suspension to conform to the restriction of 60-days set forth in 11 U.S.C. § 365(d)(3), i.e., May 10, 2020, together with such other and further relief as to this Court seems just, proper and equitable.

Dated: April 24, 2020

By: /s/ Douglas T. Tabachnik
Law Offices of Douglas T. Tabachnik, P.C.
63 West Main Street, Suite C
Freehold, NJ 07728-2141
Tel: (732) 780-2760
Fax: (732) 780-2761
dtabachnik@dtlaw.com
*Attorneys for The Retail Stores of 611 6th Avenue LLC,
and its affiliates*